



CORPORATE COMMISSION  
*of the Mille Lacs Band of Ojibwe Indians*

**CORPORATE ORDER #0912.1**  
**OF**  
**THE CORPORATE COMMISSION OF THE**  
**MILLE LACS BAND OF OJIBWE INDIANS**

The undersigned, the Commissioner of Corporate Affairs of the Corporate Commission of the Mille Lacs Band of Ojibwe Indians, a Corporate Body Politic (the "Commission"), hereby adopts the following Corporate Order effective this 21<sup>st</sup> day of December, 2009.

**WHEREAS**, the Commissioner of Corporate Affairs shall issue regulations and other directives in the form of Corporate Orders to accomplish the Commissioner's corporate duties and responsibilities; and

**WHEREAS**, the Company's financial and legal interests require a policy that ensures that individuals are not allowed to solicit or distribute on Company property, and;

**WHEREAS**, the existing policy (#23.002 – Solicitation Prohibition) does not adequately meet the current needs of ensuring the Company's financial and legal interests and must therefore be replaced in its entirety.

**NOW THEREFORE BE IT RESOLVED**, that the Commission adopts the following Non-Solicitation/Non-Distribution Policy (#23.002) as attached Exhibit A in replacement of existing Policy #23.002

**BE IT FURTHER RESOLVED**, that with the adoption of the new Non-Solicitation/Non-Distribution Policy #23.002, the Commission hereby repeals all previous versions of Policy #23.002.

**IT IS SO ORDERED,**

A handwritten signature in black ink, appearing to read "Deron A. Dunkley", is written over a horizontal line.

Deron A. Dunkley  
Commissioner of Corporate Affairs

Exhibit A to Corporate Order 0912.1  
**Corporate Commission of the Mille Lacs Band of Ojibwe Indians**  
**Policy and Practice Manual**

<b>Section:</b> Human Resources - Associate Relations	<b>Number:</b> 23.002 <b>Page:</b> 1 of 3
	<b>Issue Date:</b> 10/1/92
<b>Procedure:</b> <del>Non-Solicitation</del> <u>Solicitation</u> / <del>Non-Distribution</del> <u>Prohibition</u>	<b>Revision Date:</b> 8/2/2015/039
	<b>Approval:</b>

**I. Purpose**

To ~~restrict~~ prohibit Organizational solicitation Solicitations and distribution Distributions on all Company property, ~~by associates or by individuals or groups not associated with the Company during actual working time.~~

**II. Policy**

It is the policy of Corporate Commission to strictly prohibit ~~solicitation~~ Solicitation and Distribution for any Organizational purpose during working time anywhere on Company property. ~~Unrestricted~~ Organizational solicitation Solicitation on Company premises interferes with the normal operations of the Company organization, ~~is detrimental to discipline and efficiency on the part of associates,~~ and is annoying to guests.

All ~~Persons~~ persons who are not employed by the Company are prohibited from soliciting and/or distributing for an Organization on Company property. This includes, but is not limited to, soliciting for funds or signatures, conducting membership drives, distributing literature or gifts, offering to sell merchandise or services, or engaging in any other ~~solicitation~~ Solicitation ~~or similar activity~~ during work hours or in work areas.

This policy shall be in effect and enforced in any Corporate Commission operated building, owned or leased; public parking areas, owned or leased; and ingress and egress areas (both pedestrian and automobile areas) which are maintained, owned and/or operated by Corporate Commission expressly for use by its guests, invitees (expressed or implied), and its associates.

Associates violating this policy may be subject to disciplinary action up to and including termination.

Non-associates violating this policy may be subject to arrest for trespassing.

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**III. Practice Definitions**

- A. Solicitation means any verbal or written communication that calls upon the reader to take action of any kind.
- B. Organization means a group of more than one person identified by a shared interest/purpose or an entity formed for an identified commercial purpose other than the Corporate Commission and its subsidiaries and other than charitable Organizations designated as a 501(c)(3) under the Internal Revenue Code or designated as an Indian Charitable Organization by the Gaming Regulatory Authority pursuant to Title 15 of the Mille Lacs Band Statutes Annotated.
- C. Distribution means the handing out or delivery of things.

~~The terms "solicitation" and "organization" include any verbal or written communication made by any associate or group of associates or non-associates to another associate or group of associates that encourage, advocate, demand, or request a contribution of money, time, effort or personal involvement or membership in any fund (charitable or otherwise), collection, athletic team, social, fraternal, religious, civil, political or labor organization of any kind or type whatsoever, or the purchase of any merchandise, raffle, lottery tickets, or other similar items.~~

**IV. Prohibitions**

- B. A. All persons~~s~~ associates are prohibited from using Company supplies and equipment (including its duplication equipment, computers, ~~toy drives~~ and electronic mail system) for ~~solicitation~~Solicitation or Distribution on behalf of an Organization purposes. In addition, associates are prohibited from providing work telephone numbers for conducting personal or family business ventures.
- B. Uniformed Associates are prohibited from wearing any article of clothing, jewelry, buttons, or badges that are not directly provided by the Company. related to their work and that may cause disruption to a productive work environment.

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	<b>Approval:</b>

~~D~~C. The Company maintains bulletin boards to communicate Company information to associates, ~~and to post notices required by law and for associates to communicate with one another about non-Organizational or non-commercial matters (such as offering personal property or personal services of a non-commercial nature).~~ These bulletin boards shall not be used for postings regarding Organizational matters, ~~are for the posting of Company information and notices only.~~ Only persons ~~information approved designated by the Company~~ as being consistent with this Policy may be placed ~~notices on, or removed material from, the Bulletin boards.~~ The Any unauthorized posting is strictly prohibited. ~~of notices, photographs, or other printed or written materials on bulletin boards or on any other the Company property is prohibited.~~

~~E.~~ Certain recognized charities are permitted to solicit contributions on Company premises during specified times of the year and with prior approval of management. Managers and associates may volunteer to assist these organizations by conducting their charity drives. Each associate may decide whether or not to contribute. There will be no discrimination against associates because of their willingness or unwillingness to contribute.

~~D.~~ All persons are prohibited from Soliciting or Distributing on behalf of an Organization.

~~E.~~ Non-associates are strictly prohibited from Soliciting or Distributing.

~~F.~~ Associates may be permitted to engage in solicitations or distributions of literature for any group or organization, including charitable organizations, by selling candy, cookies, craft items, etc. in accordance with the following restrictions:

- ~~1.~~ Solicitation and distribution of literature are prohibited during the working time of either the associate making the solicitation or distribution or the targeted associate(s). The term "working time" does not include an associate's authorized lunch or rest periods or other time when the associate is not required to be working.

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2. ~~Any solicitation or distribution of literature may take place only in non-work areas, i.e. locker rooms, break rooms or lunchrooms.~~
3. ~~The distribution of literature in such a manner as to cause litter on Company property is prohibited.~~
4. ~~Solicitations via Company email or voice mail are prohibited.~~
5. ~~Off-duty associates are not permitted to return to the Company premises until their next scheduled work time except as a guest of the Company.~~

**Only the Commissioner of Corporate Affairs may make an exception to this policy.**